ANTHONY J. DELUCA, ESQ. Nevada Bar No.: 006952 DELUCA & ASSOCIATES 5830 West Flamingo Road, Suite 233 Las Vegas, Nevada 89103 (702) 873-5386 Fax (702) 873-5903 anthony@deluca-associates.com

## IN THE UNITED STATES BANKRUPTCY COURT District of Nevada

I

| In Re:         |           | Case No. 09-17464-MKN        |
|----------------|-----------|------------------------------|
|                |           | Trustee: KATHLEEN A. LEAVITT |
| Jayson Pearson |           |                              |
|                |           | Chapter:13                   |
|                |           |                              |
|                | Debtor(s) | Hearing Date: 09/30/09       |
|                |           | Hearing Time: 1:30pm         |

## **OPPOSITION TO MOTION FOR RELIEF FILED BY** Deutsche Bank National Trust

COMES NOW Jayson Pearson (hereinafter referred to as "debtor(s)"), by and through their attorney, Anthony J. DeLuca, Esq., and hereby oppose the Motion for Relief filed by Deutsche Bank National Trust on the grounds set forth below.

- 1. On May 8, 2009, the above-named Debtor(s) filed a Voluntary Petition under Chapter13 of the Bankruptcy Code.
- 2. On 09/02/09, Deutsche Bank National Trust filed a Motion for Relief from the Automatic Stay on Debtor's property commonly known as 7917 Sally Irene Ct Las Vegas, NV 89113.
- 3. Debtor's attorney has already requested an order for adequate protection allowing debtor to cure any default.

WHEREFORE, Debtor respectfully prays that this Honorable Court

- 1. Deny Movant's motion for relief.
- 2. Any further just and equitable relief this Court deems proper under the premises.

DATED this 25<sup>th</sup> Day of September, 2009.

DELUCA & ASSOCIATES

/s/ Anthony J. DeLuca, Esq.

Attorney for Debtor(s)